



# County of San Diego

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## **Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist Pursuant to CEQA Guidelines §15183**

**Date:** August 6, 2015  
**Project Title:** Rancho Guejito Rockwood Village Major Grading Plans  
**Record ID:** PDS2015-LDGRMJ-30016  
**Plan Area:** North County Metro Subregional Plan area  
**GP Designation:** Rural Lands (RL-40)  
**Density:** 1 du / 40 ac  
**Zoning:** General Agricultural Use Regulations (A72)  
Limited Agricultural Use Regulations (A70)  
**Min. Lot Size:** 10 ac  
**Special Area Reg.:** 'A' Agricultural Preserve  
**Lot Size:** 279 acres  
**Applicant:** Rancho Guejito Corporation 1-800-519-4441  
**Staff Contact:** Emmet Aquino, Planner - (858) 694-8845  
[Emmet.Aquino@sdcounty.ca.gov](mailto:Emmet.Aquino@sdcounty.ca.gov)

### **Project Description**

The project is an agricultural major grading permit application to create private eight foot wide grove roads and prepare for the planting of agricultural crops. The project site is located west of Rockwood Canyon and north of State Route (SR)-78 in the North County Metro Subregional Plan Area. The project covers 279.1 acres and the property to be planted consists of two distinct areas. The most northerly planting area (approximately 221.3 acres) is located north and east of the San Diego Safari Park. The southerly planting area (approximately 57.8 acres) is located on steep slopes forming the western edge of Rockwood Canyon and will be an extension of existing groves. The southern planting area would be accessed via a combination of existing private dirt roads from State Route (SR-78) and existing grove roads within the existing grove. Access to the northern planting area is via a private road, West Zoo Road/Rockwood Road.

Irrigation would be installed, the areas to be planted would be cleared and the property would be planted with avocados. The new groves would be irrigated using water from existing wells located throughout Rockwood Canyon.

The project site is subject to the Rural General Plan Regional Category, Land Use Designation Rural Lands (RL-40). Zoning for the site is A70, Limited Agricultural Use. The project is consistent with density and lot size requirements of the General Plan and Zoning Ordinance.

The proposed grading is designed to be a balanced cut and fill operation and would move approximately 33,250 cubic yards of dirt to create new eight foot wide grove roads. These grove roads would be used to access the new groves for planting, maintenance and harvest of the trees and crop. Of the 279.1 acres included within the boundaries of the proposed permit, 22.1 acres would be roads, 241.5 acres would be planted and 15.5 acres would be avoided as unsuitable for planting.

The project includes a water line that would extend from the northwestern corner of the southerly planting area to the southern portion of the northerly planting area. This water line is approximately 2,214 feet long. It will be located in a swath of land that is 20 feet wide, which is sufficient for trenching, spoil location, pipe installation and trench filling.

### **Overview**

California Public Resources Code section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. Section 15183 specifies that examination of environmental effects shall be limited to those effects that: (1) Are peculiar to the project or the parcel on which the project would be located, and were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent, (2) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or (3) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact.

### **General Plan Update Program EIR**

The County of San Diego General Plan Update (GPU) establishes a blueprint for future land development in the unincorporated County that meets community desires and balances the environmental protection goals with the need for housing, agriculture, infrastructure, and economic vitality. The GPU applies to all of the unincorporated portions of San Diego County and directs population growth and plans for infrastructure needs, development, and resource protection. The GPU included adoption of new General Plan elements, which set the goals and policies that guide future development. It also included a corresponding land use map, a County Road Network map, updates to Community and Subregional Plans, an Implementation Plan, and other implementing policies and ordinances. The GPU focuses population growth in the western areas of the County where infrastructure and services are available in order to reduce the potential for growth in the eastern areas. The objectives of this population distribution strategy are to: 1) facilitate efficient, orderly growth by containing development within areas potentially served by the San Diego County Water Authority (SDCWA) or other existing infrastructure; 2) protect natural resources through the reduction of population capacity in sensitive areas; and 3) retain or enhance the character of communities within the unincorporated County. The SDCWA service area covers approximately the western one third of the unincorporated County. The SDWCA boundary generally represents where water and wastewater

infrastructure currently exist. This area is more developed than the eastern areas of the unincorporated County, and would accommodate more growth under the GPU.

The GPU EIR was certified in conjunction with adoption of the GPU on August 3, 2011. The GPU EIR comprehensively evaluated environmental impacts that would result from Plan implementation, including information related to existing site conditions, analyses of the types and magnitude of project-level and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts.

### Summary of Findings

The Rancho Guejito Rockwood Village grading plan is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the proposed project, identified applicable mitigation measures necessary to reduce project specific impacts, and the project implements these mitigation measures (see [http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS\\_Aug2011/EIR/FEIR\\_7.00 - Mitigation Measures 2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf) for complete list of GPU Mitigation Measures.

A comprehensive environmental evaluation has been completed for the project as documented in the attached §15183 Exemption Checklist. This evaluation concludes that the project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the County of San Diego General Plan, as analyzed by the San Diego County General Plan Update Final Program EIR (GPU EIR, ER #02-ZA-001, SCH #2002111067), and all required findings can be made.

In accordance with CEQA Guidelines §15183, the project qualifies for an exemption because the following findings can be made:

**1. The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.**

The project is a major agricultural grading plan to create new eight foot wide grove roads and agricultural crops. The grading plan does not propose any buildings and/or structures and would result in any subdivision of the property. The project would be consistent with the Rural Lands (RL-40) development density established by the General Plan and the certified GPU EIR.

**2. There are no project specific effects which are peculiar to the project or its site, and which the GPU EIR Failed to analyze as significant effects.**

The subject property is no different than other properties in the surrounding area, and there are no project specific effects which are peculiar to the project or its site. The project site is located in an area developed with similarly sized, estate residential lots with associated accessory uses. The property does not support any peculiar environmental features, and the project would not result in any peculiar effects.

In addition, as explained further in the 15183 Checklist below, all project impacts were adequately analyzed by the GPU EIR. The project could result in potentially significant impacts to biological, cultural, and paleontological resources. However, applicable mitigation measures specified within the GPU EIR have been made conditions of approval for this project.

**3. There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.**

The proposed project is consistent with the density and use characteristics of the development considered by the GPU EIR and would represent a small part of the growth that was forecast for build-out of the General Plan. The GPU EIR considered the incremental impacts of the

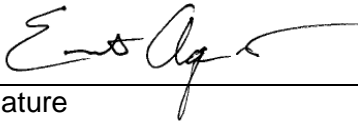
proposed project, and as explained further in the 15183 Exemption Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.

**4. There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.**

As explained in the 15183 exemption checklist below, no new information has been identified which would result in a determination of a more severe impact than what had been anticipated by the GPU EIR.

**5. The project will undertake feasible mitigation measures specified in the GPU EIR.**

As explained in the 15183 exemption checklist below, the project will undertake feasible mitigation measures specified in the GPU EIR. These GPU EIR mitigation measures will be undertaken through project design, compliance with regulations and ordinances, or through the project's conditions of approval.



Signature

**August 6, 2015**

Date

**Emmet Aquino**

Printed Name

**Environmental Planner**

Title

## **CEQA Guidelines §15183 Exemption Checklist**

### **Overview**

This checklist provides an analysis of potential environmental impacts resulting from the proposed project. Following the format of CEQA Guidelines Appendix G, environmental effects are evaluated to determine if the project would result in a potentially significant impact triggering additional review under Guidelines section 15183.

- Items checked “Significant Project Impact” indicates that the project could result in a significant effect which either requires mitigation to be reduced to a less than significant level or which has a significant, unmitigated impact.
- Items checked “Impact not identified by GPU EIR” indicates the project would result in a project specific significant impact (peculiar off-site or cumulative that was not identified in the GPU EIR.
- Items checked “Substantial New Information” indicates that there is new information which leads to a determination that a project impact is more severe than what had been anticipated by the GPU EIR.

A project does not qualify for a §15183 exemption if it is determined that it would result in: 1) a peculiar impact that was not identified as a significant impact under the GPU EIR; 2) a more severe impact due to new information; or 3) a potentially significant off-site impact or cumulative impact not discussed in the GPU EIR.

A summary of staff’s analysis of each potential environmental effect is provided below the checklist for each subject area. A list of references, significance guidelines, and technical studies used to support the analysis is attached in Appendix A. Appendix B contains a list of GPU EIR mitigation measures.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>1. AESTHETICS</b> – Would the Project:			
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

- 1(a) The project would be visible from public roads and trails; however, the site is not located within a viewshed of a scenic vista.
- 1(b) The property is not within the viewshed of a County or state scenic highway. The project site also does not support any significant scenic resources that would be lost or modified through development of the property.
- 1(c) The project would be consistent with existing community character. The project is located in an area characterized as vacant lands, scattered rural residences and agricultural uses. West of the project site along San Pasqual Valley Road is the San Diego Zoo Safari Park. The proposed agricultural grading application would not substantially degrade the visual quality of the site or its surroundings because the project would result in an expansion to an existing agricultural operation.
- 1(d) The project is an agricultural grading plan to expand agricultural operations on site. This project does not propose any lighting that would spillover onto adjacent properties and would not adversely affect day or nighttime views.

### Conclusion

As discussed above, the project would not result in any significant impacts to aesthetics; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>2. Agriculture/Forestry Resources</b> – Would the Project:			
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to a non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- |   |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?                                      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

## Discussion

- 2(a) The project site has Farmland of Local Importance, Grazing Land and Unique Farmland. Due to the presence of onsite agricultural resources, the County agricultural resources specialist, Michael Johnson, evaluated the site to determine the importance of the resource based on the County's Local Agricultural Resources Assessment (LARA) model which takes into account local factors that define the importance of San Diego County agricultural resources. The LARA model considers the availability of water resources, climate, soil quality, surrounding land use, topography, and land use or parcel size consistency between the project site and surrounding land uses. A more detailed discussion of the LARA model can be found in the Guidelines for Determining Significance for Agricultural Resources at <http://www.sdcounty.ca.gov/pds/docs/AG-Guidelines.pdf>.

In order for a site to be considered an important agricultural resource based on the LARA model, all three required LARA model factors (water, soil, and climate) must receive either a high or moderate score. A low score in any of these three categories would render a LARA model result that the site is not an important agricultural resource. After review, it was determined that the project would receive a low Soil Quality score as the footprint of the project contains less than 5 acres of Prime Farmland Soils or Soils of Statewide Importance and the project area covers over 279 acres. As shown on Table 8 of the County of San Diego Guidelines for Determining Significance and report Format and Content Requirements for Agricultural Resources, this would receive a low score. In addition, the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to a non-agricultural use because the project proposes a major grading permit for the purpose of planting agricultural crops.

- 2(b) The project site is zoned A72, which is considered to be an agricultural zone. The proposed project will not result in a conflict in zoning for agricultural use, because the project is for an agricultural use. Although the project falls within an agricultural preserve (San Pasqual/Ag. Preserve number 20.), the project is an agricultural grading permit to expand an agricultural use and would therefore be consistent with the preserve.

Additionally, the project site's land is not under a Williamson Act Contract. Therefore, there will be no conflict with existing zoning for agricultural use, or a Williamson Act contract.

- 2(c) There are no timberland production zones on or near the property.
- 2(d) The contiguous ownership of the Rancho Guejito property is adjacent to the Cleveland National Forest (CNF). However, the proposed agricultural grading plan for Rockwood would be nearly four miles from the nearest boundary with the CNF.
- 2(e) The project site is located adjacent to agricultural uses. As a result, the proposed project was reviewed by Michael Johnson (PDS Agricultural Specialist) and was determined not to have significant adverse impacts related to the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance or active agricultural operations to a non-agricultural use because the project is a major grading permit for the purpose of planting agricultural crops. The project will not introduce a use that would lead to the conversion of Important Farmland or other agricultural resources, to non-agricultural use.

### Conclusion

As discussed above, the project would not result in any significant impacts to agricultural resources; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>3. Air Quality – Would the Project:</b>			
a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

- 3(a) The applicant has applied for an agricultural grading permit to create an expansion to agricultural operations consisting of internal access and planting avocados. The permit



would allow the grading expansion of the existing agricultural operations on-site. The grading is temporary to prepare the site for agricultural use. Therefore, there would be no growth or operational emissions associated with the project. Air emissions would be limited to fugitive dust and criteria air pollutants emitted during grading and the placement of fill materials.. These emissions would be temporary and would cease at the completion of grading. Because the project would not lead to long-term operational emissions under this action, it is not expected to conflict with either the RAQS or the SIP.

- 3(b) Grading operations associated with the construction of the project would be subject to the Grading Ordinance, which requires the implementation of dust control measures. Emissions from the construction phase would be minimal, temporary and localized, resulting in pollutant emissions below the screening level criteria established by County air quality guidelines for determining significance. According to the Bay Area Air Quality Management District CEQA Guidelines for Assessing the Air Quality Impacts of Projects and Plans, projects that generate less than 2,000 ADT are below the screening-level criteria established by the guidelines for criteria pollutants. This project would be well below this 2,000 ADT threshold.
- 3(c) The project would contribute PM<sub>10</sub>, NO<sub>x</sub>, and VOCs emissions from construction/grading activities; however, the incremental increase would not exceed established screening thresholds (see question 3(b) above)).
- 3(d) The project would not introduce additional sensitive receptors on-site. Project related grading is associated with agricultural operations. Additionally, the project does not propose uses or activities that would result in exposure of these sensitive receptors to significant pollutant concentrations and will not place sensitive receptors near any carbon monoxide hotspots.
- 3(e) The project could produce objectionable odors during construction and operation; however, these substances, if present at all, would only be in trace amounts (less than 1 µg/m<sup>3</sup>).

### Conclusion

As discussed above, the project would not result in any significant impacts to air quality; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>4. Biological Resources – Would the Project:</b>			
Have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

California Department of Fish and Wildlife or US Fish and Wildlife Service?

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

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d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

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e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

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## Discussion

4(a) Sensitive plant and animal species are those listed as federally threatened or endangered by the U.S. Fish and Wildlife Service (USFWS); state listed as threatened or endangered or considered sensitive by the California Department of Fish and Wildlife (CDFW); included in the MSHCP as Covered Species, Non-Covered Species, Criteria Area Species, and/or Narrow Endemic Plant Species; and/or are California Native Plant Species (CNPS) List 1A, 1B, or 2 species, as recognized in the CNPS's Inventory of Rare and Endangered Vascular Plants of California and consistent with the CEQA Guidelines. Vegetation communities, plants, and wildlife may be considered to have special status due to declining occurrence/populations, vulnerability to habitat change, or restricted distributions.

Biological resources within the proposed project site were mapped by HELIX Environmental Planning in 2013 and 2014 as part of the Rancho Guejito Rockwood Canyon Multiple Species Conservation Program (MSCP) boundary adjustment. The project site also was surveyed as part of the jurisdictional delineation conducted for the project by BonTerra Psomas, as documented in a memo dated April 2, 2015. As detailed in the jurisdictional delineation memo, no plant or wildlife species listed as endangered, threatened, or rare pursuant to the federal or state Endangered Species Acts or that are otherwise considered sensitive were observed or are expected to occur within the proposed water line corridor due to lack of previous observations and lack of suitable habitat. Several special status plant and wildlife species meeting the criteria under Section 15380 of the State CEQA Guidelines were determined to have the potential to occur within the planting areas of the project site. Federally-designated critical habitat for arroyo toad (*Anaxyrus californicus*) is located over 1,800 feet east of the southern planting area in the Guejito Creek Watershed; no breeding habitat for this species occurs onsite and this species is not expected to utilize on-site upland habitats. Therefore, arroyo toad is not expected to be directly or indirectly impacted by the project.

One federally listed as threatened avian species (coastal California gnatcatcher [*Polioptila californica californica*]) has the potential to nest within Diegan coastal sage scrub areas. Due to the proximity of known nesting locations for gnatcatcher, surveys for the species will be required prior to ground disturbing activities within suitable habitat (sage scrub areas).

As considered by the GPU EIR, project impacts to sensitive habitat and/or species will be mitigated through ordinance compliance and through implementation of project-specific mitigation measures. The GPU EIR identified these mitigation measures as Bio-1.6 and Bio-1.7. Project-specific mitigation includes pre-construction surveys for coastal California gnatcatcher and monitoring by a County-approved biological monitor during the water line installation to ensure that sensitive species are not impacted. The proposed northern and southern planting areas are considered exempt from providing compensatory biological mitigation as they are located outside of MSCP Pre-approved Mitigation Areas (PAMA), would be established with agricultural uses within one year and will be retained in agriculture for at least ten years, and are not located within a floodplain (Section 86.503(a)(10) of the County's Biological Mitigation Ordinance). Therefore, project impacts to sensitive plant and wildlife species are considered less than significant.

- 4(b) Based on the biological resources mapping conducted for the project, the site primarily supports Diegan coastal sage scrub (including disturbed), chamise chaparral, mixed chaparral, and non-native grassland. The proposed water line corridor occurs within Diegan coastal sage scrub, granitic chamise chaparral, and southern mixed chaparral vegetation communities. Current and historic livestock grazing and agricultural use also occur within the project site. Implementation of the proposed water line would result in approximately 0.5 acre of one special status vegetation type, Diegan coastal sage scrub. Upon completion of the proposed water line, a restoration plan will be implemented to restore the natural vegetation previously existing within the 20-foot swath in which the water line will be constructed. The revegetation plan will specify plants to be used, timing/schedule, and a two-year monitoring plan to monitor plant growth and remove invasive species.

As documented in the project jurisdictional delineation memo dated April 2, 2015, no riparian habitat is present within the water line corridor. None of the jurisdictional features identified in the southern planting area exhibited wetland or riparian habitat characteristics. The northern planting area contains 27 jurisdictional features that exhibit ephemeral features displaying ordinary high water marks and other indicators of wetland/riparian habitat. A 25-foot-wide buffer would be included on either side of mapped jurisdictional waters. Jurisdictional features would be staked with flagging to mark the edge of the buffers and personnel would be instructed to avoid all disturbances within the staked areas. Where existing dirt roads currently cross jurisdictional areas at grade, portable steel structures would be installed with a sufficient span to avoid the mapped jurisdictional areas.

In addition to GPU EIR mitigation measures Bio-1.6 and Bio-1.7 noted above, the GPU EIR identified mitigation measures Bio-2.2, Bio-2.3, and Bio-2.4 to reduce direct and indirect project impacts to riparian and other sensitive habitats. As noted above, the project would avoid impacts to riparian habitats and implement a revegetation plan to mitigate for impacts to Diegan coastal sage scrub from construction of the water line corridor. Mitigation for impacts to sensitive natural communities within the proposed planting areas is not required, pursuant to Section 86.503(a)(10) of the County's

Biological Mitigation Ordinance. Best management practices (BMPs) such as silt fences, hydroseeding and the installation of gravel bags, would be shown on project grading plans and would be installed to reduce and control run-off. Therefore, project impacts to riparian habitat or sensitive natural communities identified in the County Multiple Species Conservation Program (MSCP), County RPO, Natural Community Conservation Plan, Fish and Wildlife Code, Endangered Species Act, Clean Water Act, or any other local or regional plans, policies or regulations, are considered less than significant.

- 4(c) A jurisdictional delineation for wetlands and non-wetland waters under the jurisdiction of the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW) was conducted for the proposed project by BonTerra Psomas, as documented in a memo dated April 2, 2015. The USACE, RWQCB, and CDFW have jurisdictional authority over rivers, streams, creeks, drainages, and other types of waters or wetlands in California. The USACE normally regulates impacts to waters of the U.S. pursuant to Section 404 of the federal Clean Water act. Section 404(f) of the Clean Water Act states that discharges that are part of normal farming, ranching, and forestry activities associated with an active and ongoing farming or forestry operation generally do not require a Section 404 permit. Therefore, any impacts to waters of the U.S. resulting from normal agricultural practices would not require a permit from USACE.

The jurisdictional delineation conducted for the project indicated that none of the topographic features observed in the southern planting area are subject to the regulatory jurisdiction of the USACE (pursuant to Section 404 of the federal Clean Water Act), CDFW (pursuant to Section 1602 of the California Fish and Game Code) or RWQCB. No potential wetlands or waters were identified in the southern planning area. For the northern planting area, 27 features were identified that are considered subject to the regulatory jurisdiction of the USACE and/or CDFW (e.g., vegetated ephemeral drainages), including 3 localized sub-watersheds/tributaries to the San Pasquel River. Within the sub-watersheds, two unnamed tributaries contain 10 of the jurisdictional features and flow south and southwest from the project site to the drainage conveyance structure within the San Diego Zoo Wild Animal Park. The remaining 17 jurisdictional features are within the other unnamed tributary flowing north to Rockwood Canyon. No topographic features that could potentially be subject to the regulatory jurisdiction of the USACE, RWQCB, or CDFW were identified within the proposed water line corridor alignment areas.

As described in response 4(c) above, GPU EIR mitigation measures Bio-1.6, Bio-1.7, Bio-2.2, Bio-2.3, and Bio-2.4 would reduce direct and indirect project impacts to riparian and other sensitive habitats. Project-specific mitigation includes the use of 25-foot-wide buffers on either side of mapped jurisdictional areas to avoid disturbance during construction. Existing dirt roads that cross jurisdictional areas at grade will be left in place; portable steel structures would be installed with a sufficient span to avoid the mapped jurisdictional areas. One additional crossing would be created using all-weather clear span crossings to reduce impacts to the jurisdictional areas. Based on these considerations, project impacts to federally protected wetlands as defined by Section 404 of the Clean Water Act are considered less than significant.

- 4(d) The project site is located adjacent to PAMA areas that support native vegetation that likely serves as a wildlife corridor. However, the agriculture is proposed in the least

sensitive areas, outside of PAMA. Wildlife movement on site, particularly within the PAMA, is not expected to be adversely affected.

- 4(e) The proposed project is seeking a Certificate of Inclusion per the provisions in Section 4.3.4.1 of the MSCP Subarea Plan. As described in Section 4.3.4.1 of the County MSCP Subarea Plan, clearing and grading of habitat for agricultural purposes outside of floodplains and the PAMA may be authorized by the County provided that the property is established as an agricultural operation within one year and retained in agriculture for at least ten years. The total number of acres for all exemptions granted for agricultural clearing within the MSCP Subarea Plan may not exceed 3,000 acres.

The project proposes approximately 279.1 acres of land to be granted for agricultural clearing within the MSCP Subarea Plan. The proposed agricultural clearing is not expected to pose a threat to the assembly of a preserve system because the MSCP allows the loss of up to 3,000 acres of habitat to farming activities and the 3,000 acre limitation has not been exceeded. Out of the 3,000 acres allotted, less than 200 acres of agricultural land have been exempted to date. This project would bring the total to approximately 450 acres. This loss was expected under the MSCP Plan and as such, will not impact the preserve system. Therefore, the project would be in compliance with the MSCP.

Refer to the attached Ordinance Compliance Checklist for further information on consistence with any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan, or any other local policies or ordinances that protect biological resources, including the MSCP, Biological Mitigation Ordinance, Resource Protection Ordinance (RPO), and Habitat Loss Permit (HLP).

## Conclusion

The project could result in potentially significant impacts to biological resources; however, further environmental analysis is not required because:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR will be applied to the project.

## 5. Cultural Resources – Would the Project:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?

Significant  
Project  
Impact

Impact not  
identified by  
GPU EIR

Substantial  
New  
Information

☐
☐
☐

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Directly or indirectly destroy a unique geologic feature?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Directly or indirectly destroy a unique paleontological resource or site?                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Disturb any human remains, including those interred outside of formal cemeteries?                         | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

## Discussion

- 5(a) Based on an analysis of records and a survey of the property by County approved archaeologist, Michael Tuma, it has been determined that there are no impacts to historical resources because they do not occur within the project site. The results of the survey are provided in the cultural resources report titled, Phase I Cultural Resources Inventory of the Rockwood Villages and Hillebrecht Parcels, Rancho Guejito (July 2015).

As considered by the GPU EIR, potential impacts to historic resources will be mitigated through ordinance compliance and through conformance with the County's Cultural Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul-1.1 and CUL-1.6.

- 5(b) Three historic period archaeological resources were identified during the archaeological survey. Two sites (CA-SDI- 21609H – mining prospect, CA-SDI-21610H – cattle related) located within the project footprint were both determined to not be significant resources. The third site (CA-SDI-21611H – water conveyance system) is adjacent to the project and is not within the project footprint. A significance determination is not required because it is not a part of the proposed project. Temporary fencing around CA-SDI-21611H will be required to avoid inadvertent impacts.

Regional coordination and consultation is identified in the GPU EIR as mitigation measures CUL-2.2, CUL-2.4, and CUL-2.6. The Native American Heritage Commission (NAHC) was contacted for a Sacred Lands file search and a listing of Native American Tribes whose ancestral lands may be impacted by the project. The NAHC response indicated that there is the potential for Native American resources to be present. Outreach to 13 Kumeyaay tribes/organizations was conducted. Responses were received from Viejas and San Pasqual which included a request for additional information related to the archaeological data, a site visit, and concerns that these kinds of agricultural projects have the potential to destroy cultural and biological resources, as well as compromising viewscapes, also important to the tribe; in particular the Rockwood Villages parcel's peaks and surrounding areas. Viejas identified that the project area contains many sacred sites that are important to the Kumeyaay people and they requested that these sites be avoided. Information was also obtained from Clint Linton, Director of Cultural Resources for the Lipay Nation of Santa Ysabel that the Rancho Guejito area is sacred to the Kumeyaay due to the traditions that occurred there.

The requirement for an archaeological monitor was overlooked; therefore, a re-visit of the site to examine resources and to discuss survey methods and results was conducted with Gabriel Kitchen as the Kumeyaay tribal representative for the effort. Mr. Kitchen agreed that the absence of quality tool stone and water on these parcels likely precluded intensive use of this area for settlements, but would have more likely been used for hunting, gathering, and/or religious activities. During the current archaeological evaluation, no prehistoric resources were identified.

Based on the archaeological survey and information provided by the Native American monitor and tribes, the potential exists for subsurface deposits. As considered by the GPU EIR, potential impacts to cultural resources will be mitigated through compliance with the Grading Ordinance and through conformance with the County's Cultural Resource Guidelines if resources are encountered. The project has been conditioned with archaeological monitoring (Cul-2.5) that includes the following:

- Pre-Construction
  - Pre-construction meeting to be attended by the Project Archaeologist and Kumeyaay Native American monitor to explain the monitoring requirements.
- Construction
  - Monitoring. Both the Project Archaeologist and Kumeyaay Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American monitor. Monitoring of previously disturbed soils will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American monitor.
  - If cultural resources are identified:
    - Both the Project Archaeologist and Kumeyaay Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
    - The Project Archaeologist shall contact the County Archaeologist.
    - The Project Archaeologist in consultation with the County Archaeologist and Kumeyaay Native American monitor shall determine the significance of discovered resources.
    - Construction activities will be allowed to resume after the County Archaeologist has concurred with the significance evaluation.
    - Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Kumeyaay Native American monitor may collect the cultural material for transfer to a Tribal curation facility or repatriation program.
    - If cultural resources are determined to be significant, a Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American monitor and approved by the County Archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).

- Human Remains.
  - The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
  - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin.
  - If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.
  - The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
  - Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.

➤ Rough Grading

- Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered. A copy of the monitoring report shall be provided to the culturally affiliated tribe.

➤ Final Grading

- A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered.
- Disposition of Cultural Material.
  - The final report shall include evidence that all prehistoric materials have been curated at a San Diego curation facility or culturally affiliated Tribal curation facility that meets federal standards per 36 CFR Part 79, or alternatively has been repatriated to a culturally affiliated Tribe.
  - The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR Part 79.

5(c) The project is an agricultural grading plan. Earthwork activities are not anticipated to directly or indirectly destroy unique geologic features.

5(d) A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on geological formations identified as cretaceous plutonic, pre-cretaceous metasedimentary, cretaceous plutonic, and quaternary alluvium that potentially contain unique paleontological resources. Proposed grading would include more than 2,500 cubic yards of excavation which has the potential to impact fossil deposits. Accordingly, grading monitoring under will be a condition of project approval.

As considered by the GPU EIR, potential impacts to paleontological resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: grading monitoring under the supervision of a County-approved



paleontologist and conformance with the County's Cultural Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul-3.1.

- 5(e) Based on an analysis of records and archaeological survey of the property, it has been determined that the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains.

### Conclusion

The project could result in potentially significant impacts to cultural resources; however, further environmental analysis is not required because:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR will be applied to the project.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>6. Geology and Soils – Would the Project:</b>			
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, liquefaction, and/or landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

- 6(a)(i) The project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault.
- 6(a)(ii) The project is a grading plan. No proposed buildings and structures are a part of this project. Additionally, any project proposing buildings must conform to the Seismic Requirements as outlined within the California Building Code. Compliance with the California Building Code and the County Building Code will ensure that the project will not result in a significant impact
- 6(a)(iii) The project site is located within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. However, the project would not expose people or structures to potential substantial adverse effects. No structures are proposed as it relates to this agricultural grading plan. All future development would be subject to building permit review in which liquefaction would be required to be addressed.
- 6(a)(iv) The site is not located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards.
- 6(b) The project is an agricultural grading plan. The project will not result in substantial soil erosion or the loss of topsoil because the project will be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance which will ensure that the project would not result in any unprotected erodible soils, will not alter existing drainage patterns, and will not develop steep slopes. Additionally, the project will be required to implement Best Management Practices (BMPs) to prevent fugitive sediment.
- 6(c) As part of the grading plan review, a geological study was submitted and considered acceptable by the Department of Public Works. Based on this study, the project would not become unstable as a result of the project, and would not result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
- 6(d) The project will not result in a significant impact because compliance with the Building Code and implementation of standard engineering techniques will ensure structural safety.
- 6(e) No septic tanks or alternative wastewater disposal systems are proposed.

### Conclusion

As discussed above, the project would not result in any significant impacts to/from geology/soils; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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### 7. Greenhouse Gas Emissions – Would the Project:

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| a) Generate greenhouse gas emissions, either directly or | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|

indirectly, that may have a significant impact on the environment?

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

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### Discussion

7(a) The project would produce GHG emissions through construction activities, vehicle trips, and residential fuel combustion. However, the project falls below the screening criteria that were developed to identify project types and sizes that would have less-than-cumulatively considerable GHG emissions. The project is an agricultural grading plan and would therefore fall below the screening criteria. For projects of this size, it is presumed that the construction and operational GHG emissions would not exceed 2,500 MT CO<sub>2</sub>e per year, and there would be a less-than cumulatively considerable impact.

7(b) The County has an adopted Climate Action Plan (CAP) ([http://www.sdcountry.ca.gov/pds/advance/Climate\\_Action\\_Plan.pdf](http://www.sdcountry.ca.gov/pds/advance/Climate_Action_Plan.pdf)) and numerous goals and policies in the County General Plan that address greenhouse gas reductions. Implementation of these measures will ensure that the County can achieve an emissions reduction target consistent with the state-mandated reduction target of Assembly Bill 32, the Global Warming Solutions Act. Through compliance with the General Plan and the County's CAP, the project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gas emissions.

### Conclusion

As discussed above, the project would not result in any significant impacts to greenhouse gas emissions; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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### 8. Hazards and Hazardous Materials – Would the Project:

a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

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b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

☐ ☐ ☐

c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances

☐ ☐ ☐

and, as a result, would it create a significant hazard to the public or the environment?

d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

☐ ☐ ☐

e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

☐ ☐ ☐

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

☐ ☐ ☐

g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

☐ ☐ ☐

h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

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### Discussion

8(a) The project will not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of Hazardous Substances, nor are Hazardous Substances proposed or currently in use in the immediate vicinity. The project is a grading plan and the project does not propose to demolish any existing structures onsite which could produce a hazard related to the release of asbestos, lead based paint or other hazardous materials.

8(b) The project is not located within one-quarter mile of an existing or proposed school.

8(c) The project does not propose structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill, is not located on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash), and is not on or within 1,000 feet of a Formerly Used Defense Site.

8(d) The proposed project is not located within an Airport Land Use Compatibility Plan (ALUCP), an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. Also, the project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport.

8(e) The proposed project is not within one mile of a private airstrip.

- 8(f)(i) OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN: The project will not interfere with this plan because it will not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.
- 8(f)(ii) SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN: The property is not within the San Onofre emergency planning zone.
- 8(f)(iii) OIL SPILL CONTINGENCY ELEMENT: The project is not located along the coastal zone.
- 8(f)(iv) EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN: The project would not alter major water or energy supply infrastructure which could interfere with the plan.
- 8f)(v) DAM EVACUATION PLAN: The project is not located within a dam inundation zone.
- 8(g) The proposed project is adjacent to wildlands that have the potential to support wildland fires. However, the project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project is an agricultural grading plan and does not propose any structures.
- 8(h) The project does not involve or support uses that would allow water to stand for a period of 72 hours or more (e.g. artificial lakes, agricultural ponds). Also, the project does not involve or support uses that will produce or collect animal waste, such as equestrian facilities, chicken coops, dairies etc, solid waste facilities or other similar uses.

### Conclusion

As discussed above, the project would not result in any significant impacts to/from hazards/hazardous materials; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>9. Hydrology and Water Quality – Would the Project:</b>			
a) Violate any waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- |   |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|
| d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| h) Provide substantial additional sources of polluted runoff?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| k) Expose people or structures to a significant risk of loss, injury or death involving flooding?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| m) Inundation by seiche, tsunami, or mudflow?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

### Discussion

- 9(a) The project will require a NPDES General Permit for Discharges of Storm Water Associated with Construction Activities. The project applicant has provided a Minor Stormwater Management Plan (SWMP) which demonstrates that the project will comply with all requirements of the WPO.

- 9(b) There are no existing impaired water body associated with the project agricultural grading plan.
- 9(c) As stated in responses 9(a) and 9(b) above, implementation of BMPs and compliance with required ordinances will ensure that project impacts are less than significant.
- 9(d) The project will obtain its water supply from on-site wells. The project will plant approximately 241.5 acres with avocados. The industry standard for water use for avocados is that each acre of avocados uses 3-5 acre feet per year. Total water use, on average, would be approximately 966 acre feet per year. Irrigation water will be provided by existing wells located throughout Rockwood Canyon. These wells all exceed 200 feet in depth and will not affect existing riparian habitat in the area. These existing wells feed an existing two million gallon reservoir located on the east side of Rockwood Canyon. The existing system provides irrigation for established crops in Rockwood Canyon and includes sufficient unused capacity to provide water for the proposed new agricultural areas. Based on the projected water use, the recent well test data on the existing Rockwood wells, and the locations of the existing Rockwood wells, the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.
- 9(e) Based on a Drainage Study submitted and accepted by Land Development staff, the project would not substantially alter any existing drainage pattern that would result in erosion or siltation concerns.
- 9(f) The project will not significantly alter established drainage patterns or significantly increase the amount of runoff based on a Drainage Study prepared for the project and accepted by Land Development staff.
- 9(g) Based on a Drainage Study submitted and accepted by Land Development staff, the project does not propose to create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems.
- 9(h) The project does not propose any impervious surfaces.
- 9(i) No FEMA mapped floodplains, County-mapped floodplains were identified on the project site or off-site improvement locations.
- 9(j) No 100-year flood hazard areas were identified on the project site.
- 9(k) The project site lies outside any identified special flood hazard area.
- 9(l) The project site lies outside a mapped dam inundation area for a major dam/reservoir within San Diego County. In addition, the project is not located immediately downstream of a minor dam that could potentially flood the property.
- 9(m)(i) SEICHE: The project site is not located along the shoreline of a lake or reservoir.
- 9(m)(ii) TSUNAMI: The project site is not located in a tsunami hazard zone.

9(m)(iii) MUDFLOW: The project would not be located in an area impacted by mudflow. See response to question 6(a)(iv).

### Conclusion

As discussed above, the project would not result in any significant impacts to/from hydrology/water quality; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>10. Land Use and Planning – Would the Project:</b>			
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

10(a) The project does not propose the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area.

10(b) The project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including policies of the General Plan and Community Plan.

### Conclusion

As discussed above, the project would not result in any significant impacts to land use/planning; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>11. Mineral Resources – Would the Project:</b>			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11(a) The project site has been classified by the California Department of Conservation – Division of Mines and Geology as MRZ-2 and MRZ-3. However, the project site is surrounded by agricultural and rural residential uses which are incompatible to future extraction of mineral resources on the project site. A future mining operation at the project site would likely create a significant impact to neighboring properties for issues			



such as noise, air quality, traffic, and possibly other impacts. Therefore, the project will not result in the loss of a known mineral resource because the resource has already been lost due to incompatible land uses.

- 11(b) The project site is located in an area that has MRZ-2 and MRZ-3 designated lands. However, the proposed project would not result in the loss of locally important mineral resources because the project site is currently surrounded by densely developed agricultural land uses including rural residential uses which are incompatible to future extraction of mineral resources on the project site. The placement of the proposed use on the project site would not result in a loss of mineral resources because the feasibility of future mining at the site is already impacted by existing land use incompatibilities. Based on current land use conditions, a future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and other impacts, thereby reducing the feasibility of future mining operations occurring, regardless of the proposed project.

Therefore, no potentially significant loss of availability of a known mineral resource of locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan or other land use plan will occur as a result of this project.

## Conclusion

As discussed above, the project would not result in any significant impacts to mineral resources; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>12. Noise – Would the Project:</b>			
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

☐☐☐

### Discussion

- 12(a) The area surrounding the project site consists of farm land, agricultural uses and scattered rural single family homes. The project will not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the following reasons:

General Plan – Noise Element: Tables N-1 and N-2 addresses noise sensitive areas and requires projects to comply with a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). Projects which could produce noise in excess of 60 dB(A) are required to incorporate design measures or mitigation as necessary to comply with the Noise Element. Based on a review of the County's noise contour maps, the project is not expected to expose existing or planned noise sensitive areas to noise in excess of 60 dB(A).

Noise Ordinance – Section 36-404: Non-transportation noise generated by the project is not expected to exceed the standards of the Noise Ordinance at or beyond the project's property line. The project is an agricultural grading plan that would result in operations associated with planting crops. The project agricultural operations do not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36-410: The project will not generate construction noise in excess of Noise Ordinance standards. Construction operations will occur only during permitted hours of operation. Also, it is not anticipated that the project will operate construction equipment in excess of an average sound level of 75 dB between the hours of 7 AM and 7 PM.

- 12(b) No Impact: The project does not propose any of the following land uses that can be impacted by groundborne vibration or groundborne noise levels.

- a) Buildings where low ambient vibration is essential for interior operation, including research and manufacturing facilities with special vibration constraints.
- b) Residences and buildings where people normally sleep including hotels, hospitals, residences and where low ambient vibration is preferred.
- c) Civic and institutional land uses including schools, churches, libraries, other institutions, and quiet office where low ambient vibration is preferred.
- d) Concert halls for symphonies or other special use facilities where low ambient vibration is preferred.

Also, the project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels on-site or in the surrounding area.

- 12(c) As indicated in the response listed under Section 12(a), the project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent

increase in noise levels that exceed the allowable limits of any applicable noise standards.

12(d) The project does not involve any operational uses that may create substantial temporary or periodic increases in ambient noise levels in the project vicinity. Also, general construction noise is not expected to exceed the construction noise limits of the Noise Ordinance. Construction operations will occur only during permitted hours of operation. Also, the project will not operate construction equipment in excess of 75 dB for more than an 8 hours during a 24 hour period.

12(e) The project is not located within an Airport Land Use Compatibility Plan (ALUCP) for airports or within 2 miles of a public airport or public use airport.

12(f) The project is not located within a one-mile vicinity of a private airstrip.

### Conclusion

As discussed above, the project would not result in any significant impacts to/from noise; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>13. Population and Housing – Would the Project:</b>			
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

13(a) The project will not induce substantial population growth in an area because the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area. Additionally, the project is an agricultural grading plan for planting agricultural crops. No structures are proposed as part of this project.

13(b) The project will not displace existing housing.

13(c) The proposed project will not displace a substantial number of people since the site is currently vacant and the project is for an agricultural grading permit.

### Conclusion

As discussed above, the project would not result in any significant impacts to populations/housing; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>14. Public Services – Would the Project:</b>			
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios for fire protection, police protection, schools, parks, or other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### Discussion

14(a) The project is an agricultural grading permit for the preparation of planting agricultural crops on-site that would not result in the need for significantly altered services or facilities.

#### Conclusion

As discussed above, the project would not result in any significant impacts to public services; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>15. Recreation – Would the Project:</b>			
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### Discussion

15(a) The project is an agricultural grading plan and would not incrementally increase the use of existing parks and other recreational facilities; However, projects would typically be required to pay fees or dedicate land for local parks pursuant to the Park Land Dedication Ordinance.

15(b) The project is an agricultural grading plan for planting agricultural crops. The project does not include trails and/or pathways.

**Conclusion**

As discussed above, the project would not result in any significant impacts to recreation; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>16. Transportation and Traffic – Would the Project:</b>			
a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion**

- 16(a) The project is a farm road improved within private property. The project would not result in any substantial ADT.
- 16(b) The project is a farm road improved within private property. The project would not result in any substantial ADT.
- 16(c) The proposed project is located outside of an Airport Influence Area and is not located within two miles of a public or public use airport.

- 16(d) The proposed project will not alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road.
- 16(e) The project is an agricultural grading plan for planting and crop maintenance. The project would not result in inadequate emergency fire access.
- 16(f) The project is not related to a public circulation design. The project is a farm road improved within private property and would not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit, bicycle or pedestrian facilities. In addition, the project does not generate sufficient travel demand to increase demand for transit, pedestrian or bicycle facilities.

### Conclusion

As discussed above, the project would not result in any significant impacts to transportation/traffic; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>17. Utilities and Service Systems – Would the Project:</b>			
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion**

- 17(a) The project is a grading plan and would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board (RWQCB).
- 17(b) The project involves new water and wastewater pipeline extensions. However, these extensions will not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.
- 17(c) The project involves new storm water drainage facilities. However, these extensions will not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.
- 17(d) The project has sufficient water supply, no entitlements are needed.
- 17(e) The project is a grading plan and does not require wastewater treatment.
- 17(f) The project is a grading plan and does not require solid waste facility permits to operate.
- 17(g) The project is a grading plan and would not produce solid waste.

**Conclusion**

As discussed above, the project would not result in any significant impacts to utilities and service systems; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

**Attachments:**

Appendix A – References

Appendix B – Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067

## Appendix A

The following is a list of project specific technical studies used to support the analysis of each potential environmental effect:

Geologic Reconnaissance-Rancho Guejito Agricultural Areas, Rockwood Village and Vineyard Ranch.  
Geocon, David B Evans & Trevor E. Myers.

Slope Stability Consultation Rancho Guejito Agricultural Areas  
Geocon, David B Evans & Trevor E. Myers (June 2, 2015)

Supplemental Slope Stability Analysis, Rancho Guejito Agricultural Areas  
Geocon, David B Evans & Trevor E. Myers

Stormwater Intake Form For Development Project  
Hank Rupp

Drainage Study for Rancho Guejito-Rockwood Village  
Rick Engineering Company, Timothy Gabrielson, P.E.

Phase I Cultural Resources Inventory for the Rancho Guejito- Rockwood Villages-  
Western EcoSystems & BonTerra Psomas

Results of Jurisdictional Delineation for Area E, Rockwood Village  
Bonterra, Brad Blood and Ann Johnston

For a complete list of technical studies, references, and significance guidelines used to support the analysis of the General Plan Update Final Certified Program EIR, dated August 3, 2011, please visit the County's website at:

[http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS\\_Aug2011/EIR/FEIR\\_5.00 -  
\\_References\\_2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00_-_References_2011.pdf)



## Appendix B

A Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067 is available on the Planning and Development Services website at:

[http://www.sdcounty.ca.gov/pds/gpupdate/GPU\\_FEIR\\_Summary\\_15183\\_Reference.pdf](http://www.sdcounty.ca.gov/pds/gpupdate/GPU_FEIR_Summary_15183_Reference.pdf)